

FILED
U.S. DISTRICT COURT

2011 JUL 19 P 1:17

DISTRICT OF UTAH

BY: DEPUTY CLERK

My Name Jesse Majors
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City, State, Zip West Jordan, Utah 84081
Phone 801-360-6880
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I am the ☒ Plaintiff
☐ Attorney for the Plaintiff and my Utah Bar number is _____

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JESSE ANNE MAJORS

Plaintiff,

vs.

THOMAS JEFFERSON SCHOOL OF
LAW, et al.,

Defendants.

**MOTION FOR ORDER
GRANTING IMMEDIATE
MANDATORY INJUNCTION
FOR RELEASE OF
EDUCATIONAL TRANSCRIPT
RECORD**

Case No. 2:11cv00558 CW

Judge Clark Waddoups
Magistrate Judge Samuel Alba

BACKGROUND

Plaintiff requests an immediate Order Granting Plaintiff Mandatory Injunction, under
Rule 65 Fed.R. Civ. P., requiring Defendants to release Plaintiff's educational transcript record.

As indicated in Plaintiff's "Amended Pleading" and "Memorandum Supporting

11 Objection to Defendant's Motion To Dismiss", Defendant Law School, Defendant Lisa Ferreira,
12 Defendant Eric Mitnick, Defendant Jeffrey Joseph, Defendant Dean Rudy Hasl, Claudia
13 Ferguson and Kim Grennan, have all received valid requests from Plaintiff to have Plaintiff's
14 transcripts sent to various persons, including herself and the State Bar of California.

15 All above-named persons have refused, in one way or another, to release any transcripts
16 of her educational record. Please refer to and incorporate section of Plaintiff's "Memorandum
17 Supporting Objection to Defendants Motion to Dismiss" dedicated to demonstrating how the
18 Defendants have blatantly violated Plaintiff's constitutional right to her educational records
19 under FERPA¹ and evidencing how Defendants have further violated her constitutional rights
20 under the Fourteenth Amendment² to "pursuit of livelihood" by not releasing said records.

21 Because Plaintiff still has not received requested transcripts and Plaintiff has applied to
22 take a Paralegal Certification Examination, in which her law school transcript is required for
23 acceptance into the exam, Plaintiff requests a mandatory injunction requiring Defendants to
24 release those transcripts to:

- 25 1. The State Bar of California
26
27 Office of Admissions
28 1149 South Hill Street
29 Los Angeles, CA 90015
- 30 2. Plaintiff
31 6649 South 5500 West
32 West Jordan, UT 84081

¹ Family Educational Rights and Privacy Act of 1974 (FERPA), 20 U.S.C.A. §1232.

² U.S.C.A. Const. Amend. XIV.

33 3. NFPA

34 P.O. Box 2016

35 Edmonds, WA 98020

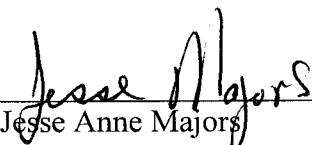
36 4. NALA

37 1516 South Boston, Suite 200

38 Tulsa, Oklahoma 74119

39
40 Plaintiff also requests an injunction prohibiting Defendants from taking part in any
41 communications, whatsoever, regarding Plaintiff to above referenced persons.

42
43 Dated this 19th day of July, 2011.

44 
45 _____
46 Jesse Anne Majors
47 Pro Se

Delivery Certificate

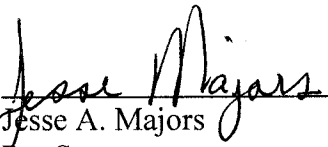
I hereby certify that I caused a true and correct copy of the foregoing Motion to be served by the method(s) indicated below and addressed to the following on this 19th day of July, 2011.

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- ☐ U.S. Mail, Postage Prepaid
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DATED this 19th day of July, 2011.



Jesse A. Majors
Pro Se